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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

11 TERREL GREGORY and ELLA UKAOMA-GREGORY, individuals,

Plaintiff,

vs.

REBECCA PALMER, an individual; SEAN MONTGOMERY, an individual; OSCAR CONCHAS, an individual; JESSE CESENA, an individual; THE CITY OF NORTH LAS VEGAS, a municipal governmental entity and a political subdivision of the State of Nevada; DOE EMPLOYEES I through X, inclusive, DOES I through XV, inclusive; and ROE CORPORATIONS I through X, inclusive,

Defendants.

CASE NO. 2:20-cv-1439-APG-EJY

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

[SECOND REQUEST]

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case by ninety-one (91) days, up to and including Monday, September 6, 2021. In addition, the parties request that the all other future deadlines contemplated by the Discovery Plan and Scheduling Order be extended pursuant to Local Rule. In support of this Stipulation and Request, the parties state as follows:

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1. On August 4, 2020, Plaintiffs filed their Complaint in the United States District
Court, District of Nevada.

2. On September 8, 2020, Defendants filed their Answer to Complaint.

3. On September 22, 2020 the parties conducted an initial FRCP 26(f) conference

4. On September 29, 2020, Defendants served their FRCP 26 Initial Disclosures on
Plaintiff.

5. On October 2, 2020, Plaintiff served his FRCP 26 Initial Disclosures on Defendant.

6. On November 5, 2020, the Court entered the Stipulated Discovery Order.

7. On January 26, 2021, Defendant served written discovery on Plaintiff. Plaintiff
served his responses on March 3, 2021.

8. On March 9, 2021, Plaintiff served written discovery on Defendants. Defendants
responses are due May 12, 2021.

DISCOVERY REMAINING

14 1. The parties will continue participating in written discovery.

15 2. Defendants will take the depositions of plaintiffs.

16 3. Plaintiffs will take the depositions of the defendants.

17 4. Defendants will gather records/documents pertinent to plaintiffs' claim.

18 5. The parties may take the depositions of any and all other witnesses garnered

19 through discovery.

20 6. The parties will depose the respective expert witnesses.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

23 The parties aver, pursuant to Local Rule 26-4, that good cause exists for the following
24 requested extension. This Request for an extension of time is not sought for any improper purpose
25 or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing
26 sufficient time to conduct discovery.

27 The ongoing impact on discovery by the current COVID-19 crisis continues to constrain
28 the parties' ability to complete discovery. Local, state, and national officials continue to warn that

1 travel should be limited and/or avoided at this time to prevent further spread of the virus. Counsel
2 for Defendants are practicing physical distancing and are working remotely. Due to these
3 unexpected and rapidly changing circumstances, an extension of the close of discovery deadline is
4 necessary so the parties may fully develop their respective cases in chief.

5 Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-4 governs
6 modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or
7 motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than
8 twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR
9 26-4.

10 This is the second request for extension of time in this matter. The parties respectfully
11 submit that the reasons set forth above constitute compelling reasons for the short extension.

12 The following is a list of the current discovery deadlines and the parties' proposed
13 extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>Monday, June 7, 2021</i>	<i>Monday, September 6, 2021</i>
Deadline to Amend Pleadings or Add Parties	<i>Closed</i>	<i>Closed</i>
Expert Disclosure pursuant to FRCP26 (a)(2)	<i>Tuesday, April 6, 2021</i>	<i>Closed</i>
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	<i>Wednesday, May 6, 2021</i>	<i>Closed</i>
Dispositive Motions	<i>Monday, July 7, 2021</i>	<i>Wednesday, October 6, 2021</i>
Joint Pretrial Order	<i>Wednesday, August 6, 2021</i>	<i>Friday, November 5, 2021</i>

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1 WHEREFORE, the parties respectfully request that this Court extend the discovery period
2 by ninety (90) days from the current deadline of June 7, 2021, up to and including September 6,
3 2021, and the other dates as outlined in accordance with the table above.

4 Dated this 14th day of May, 2021.

5 LEWIS BRISBOIS BISGAARD & SMITH LLP

6 */s/ Robert W. Freeman*
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Dated this 14th day of May, 2021.

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13 **ORDER**

14 IT IS SO ORDERED.

15 Dated this 14th day of May, 2021.

16 
17 Layna J. Zouchah
18 U.S. MAGISTRATE JUDGE